

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
-----X

UNITED STATES OF AMERICA,

- against -

19 Cr. 472 (PAC)

SALVATORE TAGLIAFERRO,

NOTICE OF MOTION

Defendant.

-----X

TO: AUSA Thomas A. McKay  
AUSA Jarrod L. Schaeffer

PLEASE TAKE NOTICE that upon annexed Memorandum of Law and all pleadings and proceedings previously had herein, Defendant SALVATORE TAGLIAFERRO, by and through his attorneys, Michael K. Bachrach, Esq., and Richard H. Rosenberg, Esq., will move this Court before the Honorable Paul A. Crotty, United States District Court Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., New York, New York 10007, on a date and time to be determined by the Court, for an order granting a Judgment of Acquittal pursuant to Rule 29 of the Federal Rules of Criminal Procedure, or, alternatively, for a new trial pursuant to Rule 33 of the Federal Rules of Criminal Procedures, and for any other relief the Court finds just and proper.

Dated: New York, New York  
June 4, 2021

Respectfully submitted,

***/S/ Michael K. Bachrach***

Michael K. Bachrach  
Richard H. Rosenberg  
*Attorneys for Defendant Salvatore Tagliaferro*

cc: The Hon. Paul A. Crotty (by ECF and by mail)